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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE APPLICATION OF EURASIAN
NATURAL RESOURCES CORPORATION
LTD.,

Applicant.

Case No. 18-MC-80041-LB

**STIPULATION AND [PROPOSED]
ORDER REGARDING
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER CASES
SHOULD BE RELATED**

Civil L.R. 3-12

Civil L.R. 7-11

IT IS HEREBY STIPULATED by and between the parties hereto through their respective attorneys of record that the matter captioned *In re Application of Dechert LLP*, 4:18-mc-80114-DMR, filed June 29, 2018 is related pursuant to Local Rule 3-12 to the matter captioned *In re Application of Eurasian Natural Resources Corporation Ltd.*, 18-mc-80041-LB, filed February 23, 2018. The parties further agree and stipulate, subject to approval of the Court, that *In re Application of Dechert LLP*, 4:18-mc-80114-DMR should be related to this case, *In re Application of Eurasian Natural Resources Corporation Ltd.*, 18-mc-80041-LB and assigned to the Honorable Laurel Beeler.

The parties stipulate that there is not prejudice to any party if the cases are related and assigned to the Honorable Laurel Beeler.

SO STIPULATED.

Date: July 9, 2018

/s/ *H. Joseph Escher III*

H. Joseph Escher III
Counsel for Dechert LLP

Date: July 9, 2018

/s/ *Dilan Esper*

Dilan Esper
Counsel for ENRC

Date: July 9, 2018

/s/ *Dan Laidman*

Dan Laidman
Counsel for Danny Fortson

ATTESTATION FOR COMPLIANCE WITH LOCAL RULE 5-1(i)(3)

I, H. Joseph Escher III, declare under penalty of perjury under the laws of California and the United States that I have in my possession e-mail correspondence from Dilan Esper and Dan Laidman that the content of this document is acceptable to all persons required to sign the document. I declare that this document was signed in San Francisco, CA on July 9, 2018.

1 Respectfully submitted,

2 DECHERT LLP

3 /s/ H. Joseph Escher III

4 H. Joseph Escher III
5 *Counsel for Dechert LLP*

PROPOSED ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED that the Administrative Motion to Consider Whether Cases Should Be Related is GRANTED. The matter captioned *In re Application of Dechert LLP*, 4:18-mc-80114-DMR, shall be deemed related to *In re Application of Eurasian Natural Resources Corporation Ltd.*, 18-mc-80041-LB and shall be assigned to me.

Dated: _____, 2018

Magistrate Judge Laurel Beeler